

EXHIBIT H

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STEPHEN ELLIOTT,

Plaintiff

v.

MOIRA DONEGAN, and JANE DOES (1-30),

Defendants

No. 1:18-cv-05680-LDH-SJB

SUPPLEMENTAL AFFIDAVIT OF MOIRA DONEGAN

I, Moira Donegan, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I submit this affidavit as a supplement to my affidavit dated August 13, 2020.
2. As I stated in my August 13, 2020 affidavit, approximately 12 hours after I first shared the Google Spreadsheet with others, I deleted it from my personal Google account.
3. This occurred over three years ago and so I do not have a perfect recollection of the exact timing of events surrounding my deletion of the Google Spreadsheet.
4. To the best of my recollection, I resolved to take down the Google Spreadsheet after learning—sometime the evening or night of October 11, 2020—that a Buzzfeed article would make the document’s existence public.
5. To the best of my recollection, I first restricted who could access the Google Spreadsheet; I then made it accessible only to me; and I then deleted the Google Spreadsheet completely from my personal Google account.
6. To the best of my recollection, I took these steps over a very short time span and in my apartment.
7. I do not recall who was still able to access the Google Spreadsheet after I restricted access to it the night of October 11, 2017.

8. To the best of my recollection, I went to sleep between 2 and 3 a.m. on October 12, 2017, and the Google Spreadsheet was deleted from my personal Google account before I fell asleep that night.

I declare under penalty of perjury that the foregoing is true and correct.



Moira Donegan

Executed on November 17, 2020
New York, New York